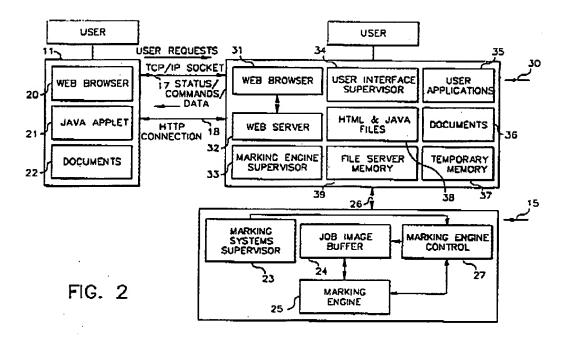
## **REMARKS**

Claims 1-29 are pending in this application and stand rejected. Claims 1, 3, 5, 12, 14, 16, 23, and 29 have been amended. The Examiner rejected Claims 1-29 under 35 USC §102 as being anticipated by USPN 6,453,127 issued to Wood. Without further explanation of the rejection, the Examiner simply notes Wood's Abstract and col. 1 line 47 through col. 2, line 7 of Wood's summary.

Wood is directed to establishing an Internet user interface to a printer. See Wood, Abstract and Title. Wood's Fig. 2, reproduced below, helps to further illustrate.



Wood's system includes a remote workstation (11), a web server computer (30), and a printer (15). A user interacts with the system through web browser (20) on work station (11) and interacts with printer (15) via programs running on computer (30). Those programs serve applets and files that allow workstation (11) to generate a user interface for printing a document.

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Through that user interface the user selects requirements for a print job and "the print job residing in a documents file memory 22 at the workstation is identified by the user, say by file name, and is downloaded from the file memory 22 (such as hard disk drive) of the workstation 11 to a temporary memory storage file 37 that is part of computer 30." Wood, col. 6, lines 35-40. When ready, printer (15) downloads the print job from temporary memory (37). Wood, col. 6, lines 41-54.

Claim 1 is directed to a method for mediating access to production devices and recited the following acts:

- acquiring an access request for a production device;
- 2. retrieving an interface from the production device, the interface having user accessible controls for selecting production options for a document;
- 3. presenting the interface to a client; and
- 4. returning production data to the production device, the production data including production options selected through the interface and instructions for accessing the document.

Claim 1 includes one or more acts not taught by Wood. Wood does not teach or suggest retrieving an interface from the production device or returning production data that includes selected production options and instructions for accessing the document. Wood's web server computer (30) does not retrieve a user interface from printer (15). Wood's web server computer (30) does not return production data that includes instructions for accessing a document in the manner required by Claim 1.

For at least these reasons, Claim 1 is patentable over Wood as are Claims 2-10 which depend from Claim 1.

Claim 11 is directed to a method for mediating access to production devices and recites the following acts:

- 1. acquiring a client's access request for a production device;
- obtaining credentials from the client;

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- upon verification of the credentials, retrieving an interface from the production device, the interface having user accessible controls for selecting production options for a document;
- presenting the interface to the client;
- 5. placing production data in a queue, the production data representing selected production options and access instructions for the document;
- 6. providing an interface having user accessible controls for managing the production data in the queue; and
- 7. returning production data from the queue to the production device.

Again, Wood does not teach or suggest retrieving an interface from the production device. Any interface retrieved according to Wood is retrieved from Woods web server computer (30). Moreover, Wood does not teach or suggest placing production data in a queue where the production data represents selected production options and access instructions for the document. Wood simply mentions placing a "print job" in temporary memory (37) of web server computer (12). Wood's "print job" is the actual data to be printed by printer (15). Wood's "print iob" is not access instructions for a document as required by Claim 11. Consequently, Wood cannot teach or suggest returning such production data from the queue to the production device in the manner required by Claim 11.

For at least these reasons, Claim 11 is patentable over Wood.

Claim 12 is directed to a computer program product for mediating access to production devices. The product includes a computer useable medium having computer readable instructions for implementing the method of Claim 1. For at least the same reasons Claim 1 distinguishes over Wood, so do Claim 12 and Claims 13-21 which depend from Claim 12:

Claim 22 is directed to a computer program product for mediating access to production devices. The product includes a computer useable medium having computer readable instructions for implementing the method of Claim 12. For at least the same reasons Claim 12 distinguishes over Wood, so does Claim 22.

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Claim 23 is directed to a system for managing electronic document production and recites the following elements:

- 1. one or more production devices;
- 2. a client operable to identify a target document, issue an access request for a selected production device, and select production options; and
- 3. a mediation service in electronic communication with the client and the production device or devices, the mediation service operable to acquire the access request for the selected production device; retrieve an interface from the selected production device, the interface having user accessible controls for selecting production options for the target document; present the interface to the client; and return selected production options with access instructions for the target document to the selected production device.

Claim 23 includes one or more elements not taught by Wood. Wood does not teach or suggest a mediation service capable of retrieving an interface from the production device or returning selected production options and access instructions for the target document. Wood's web server computer (30) does not retrieve a user interface from printer (15). Wood's web server computer (30) does not return production data that includes instructions for accessing a target document in the manner required by Claim 23.

For at least these reasons, Claim 23 is patentable over Wood as are Claims 24-28 which depend from ultimately depend from Claim 23.

Claim 29 is directed to a system for managing electronic document production and recites the following elements:

- 1. one or more production devices;
- a client operable to identify a target document, issue an access request for a selected production device, and select production options;
- 3. an interface conduit operable to mediate communication between the client and the selected production device;

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- 4. a permission engine operable to limit the mediation service to returning the interface to a client presenting verified credentials;
- a queue operable to provide a holding bin for the returned production options and access instructions for a target document;
- a production manager operable to manage the queue to release production data to a selected production device, the production data including returned production options and access instructions for a target document; and
- 7. an interface generator operable to provide the client with an interface having user accessible controls for directing the production manager.

As with Claim 23, Claim 29 includes one or more elements not taught by Wood. Wood does not teach or suggest a queue operable to provide a holding bin for the returned production options and access instructions for a target document. Wood simply mentions placing a "print job" in temporary memory (37) of web server computer (12). Wood's "print job" is the actual data to be printed by printer (15). Wood's "print job" is not access instructions for a document as required by Claim 29. Consequently, Wood cannot teach or suggest a production manager that releases production data to a selected production device where the production data includes returned production options and access instructions for a target document.

For at least these reasons, Claim 29 is patentable over Wood.

**CONCLUSION:** The foregoing is believed to be a complete response to the outstanding Office Action.

Respectfully submitted,

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